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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THOMAS SIPAN, individually,)	CASE NO. 2:19-cv-00604-RFB-DJA
)	
Plaintiff,)	
)	
vs.)	
)	
STATE FARM MUTUAL AUTOMOBILE)	
INSURANCE COMPANY, individually,)	
DOES I-X, and ROE CORPORATIONS I-X,)	
)	
Defendants.)	
)	
)	
)	

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES
(FOURTH REQUEST)

It is hereby stipulated by and between Plaintiff Thomas Sipan, by and through his attorneys, Paul D. Powell, Esq. and Thomas W. Stewart, Esq. of The Powell Law Firm, and Defendant, State Farm Mutual Automobile Insurance Company, by and through its attorney, Benjamin J. Carman, Esq. of the law firm Carman Cooney Forbush PLLC (collectively, the parties), and, hereby stipulate and agree to continue the discovery dates in this matter and request that the court enter a new discovery scheduling order containing said agreed-upon dates.

A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED

1. Defendant served its Initial Disclosures pursuant to LR 26-1 and FRCP 26(a)(1) on August 20, 2019.

1 2. Plaintiff served his Initial Disclosures pursuant to LR 26-1 and FRCP 26(a)(1) on July 26,
2 2019.

3 3. Plaintiff served his First Set of Requests for Admission, First Set of Interrogatories, and
4 First Set of Requests for Production of Documents on September 9, 2019.

5 4. Defendant served its Responses to Plaintiff's First Set of Requests for Admissions, First Set
6 of Interrogatories, and First Set of Requests for Production of Documents on October 28, 2019.

7 5. Defendant served its First Set of Requests for Admission, First Set of Requests for
8 Production of Documents, and First Set of Interrogatories on July 24, 2019.

9 6. Plaintiff served his Responses to Defendant's First Set Requests for Admission, First Set of
10 Requests for Production of Documents, and First Set of Interrogatories on December 17, 2019.

11 7. State Farm has obtained numerous sets of medical records from various healthcare providers
12 identified by Mr. Sipan, both in Nevada and in Arizona.

13 8. Plaintiff's Designation of Expert Witnesses was served on February 27, 2020.

14 9. Plaintiff served his First Supplement to Initial Disclosures pursuant to LR 26-1 and FRCP
15 26(a)(1) on February 27, 2020.

16 10. Defendant's Designation of Expert Witnesses was served on February 28, 2020.

17 11. Plaintiff's deposition was conducted on August 12, 2020.

18 12. Defendant's First Supplement to Designation of Expert Witnesses was served on August 27,
19 2020.

20 13. Plaintiff's First Supplement to his Designation of Expert Witnesses was served September
21 25, 2020.

22 14. Plaintiff's Rebuttal Expert Witness Disclosure was served September 25, 2020.

B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:

1. Deposition of Defendant's Person Most Knowledgeable of defendant State Farm Mutual Automobile Insurance Company.
2. Deposition of Dr. Lyle Young, M.D.
3. Deposition of Laurie Robinson.
4. Deposition of Clayton Ande, former employee of State Farm Mutual Automobile Insurance Company.
5. Depositions of plaintiff's experts.
6. Depositions of defendant's experts
7. Depositions of the Person Most Knowledgeable from plaintiff's medical providers relevant to treatment rendered to plaintiff since the date of this accident;
8. Obtain significant records related to plaintiff's current treatment and condition;
9. Any other discovery which may be determined as relevant and necessary by the parties;

C. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:

The onset of the covid-19 pandemic has made conducting depositions—especially depositions of physicians, many of whom have an understandably increased workflow and decreased availability—and other discovery-related tasks more difficult. As a result, the parties seek a 90-day extension of time to allow the scheduling and completion of crucial depositions, including plaintiff's treating physicians, other medical providers, and the person most knowledgeable for State Farm.

The following is a list of current discovery deadlines and the parties' proposed extended deadlines.

D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY

Current Discovery Deadlines:

Close of Discovery: October 27, 2020

Last day to file Dispositive Motions: November 27, 2020

Pre-Trial Order: December 29, 2020

Proposed Discovery Deadlines:

Close of Discovery: January 25, 2021

Last day to file Dispositive Motions: February 25, 2021

Pre-Trial Order: March 29, 2021

E. THE CURRENT TRIAL DATE

A jury trial date has not been set.

This request is not being made for the purposes of unduly delaying discovery or the trial in this matter. Further, good cause exists to extend the scheduled deadlines as set forth above.

So agreed.

Dated this 20th day of October, 2020.

Dated this 20th day of October, 2020.

THE POWELL LAW FIRM

CARMAN COONEY FORBUSH
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ORDER

Pursuant to stipulation by the parties, and for good cause shown, the discovery deadlines are continued as follows:

Close of Discovery: January 25, 2021

Last day to file Dispositive Motions: February 25, 2021

Pre-Trial Order: March 29, 2021

IT IS SO ORDERED.

DATED October 21, 2020



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

Submitted by:

THE POWELL LAW FIRM

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